

CONTINUATION OF COMPLAINT

1. I am a Senior Special Agent (SSA) of the U.S. Secret Service (USSS), presently assigned to the Grand Rapids Resident Office (GRRO). I have served in the USSS for the past 19 years. I have received training in general law enforcement and criminal investigations at the Federal Law Enforcement Training Center and at the United States Secret Service Rowley Training Center. In addition to extensive training and experience in protective duties, I have received specialized training in and have investigated many Federal felony offenses including Bank Fraud, Identity Theft, Wire Fraud, Counterfeiting, and various forms of computer crime.

2. The following information is provided for the purpose of establishing probable cause to arrest Raymone Hayden and Delron McDowell for violation of 18 U.S.C. §§ 471, 472 and 371 [manufacturing and distributing counterfeit U.S. currency, and conspiring to do so], in the Western District of Michigan and elsewhere.

3. On 6 Jan. 2020, Hayden and McDowell were observed using what were later determined to be counterfeit \$50 Federal Reserve Notes (FRN's) to make inexpensive purchases, for which they received change in genuine currency, at numerous businesses in the Traverse City area: Old Navy (Hayden); Dunhams (Hayden); Zumiez (McDowell); Mrs. Fields (McDowell); Meijer (Hayden and McDowell); Walgreens (Hayden and McDowell); Walmart (Hayden and McDowell); PetSmart (Hayden); Target (Hayden and McDowell); and Starbucks (Hayden). Both Hayden and McDowell also attempted to use counterfeit \$50 FRN's at a Spencer's Gifts store.

4. Also on 6 Jan. 2020, the Grand Traverse County Sheriff's Office (GTCSO) sent an alert, including several pictures, to fraud-loss officers of numerous retailers in the Traverse City area notifying them that two black males had been passing counterfeit locally. That same day, GTCSO Deputy Grotefendt responded to a call from a local Target store reporting that two black males, who matched the descriptions, were present at that location at that time.

5. Grotefendt arrived at the Target in a marked GTCSO vehicle, and saw two persons subsequently identified as Hayden and McDowell walking out of the store. Grotefendt, who was in uniform, exited his vehicle and approached the two as they walked towards a Ford Fusion bearing Michigan license plate HNT 5257. That vehicle was later identified as an Enterprise

rental vehicle that had been rented in Portage, MI, on 16 Dec. 2019 to an E-Clifton Ezell for a two-week period.

6. Grotefend repeatedly ordered Hayden and McDowell to stop walking, but neither of them complied. Arriving at the vehicle, Hayden got behind the steering wheel and McDowell took the front passenger seat as Grotefend continued to approach. Hayden started the vehicle and put it into drive, ignoring both Grotefend's orders to turn the engine off and his warning that he would use his Taser against Hayden. When Hayden failed to comply, Grotefend deployed his Taser against him, after which Hayden exited the vehicle and ran away. Grotefend entered the vehicle just long enough to shift it from drive into park, and in that time Hayden succeeded in escaping. McDowell, however, obeyed Grotefend's commands and was placed under arrest as he sat in the front passenger seat.

7. Not long after, GTC SO Deputy McKinley located Hayden outside a nearby apartment complex and arrested him. In a search incident to arrest, McKinley found a genuine FRN bearing serial number MG 48084047B in Hayden's wallet.

8. One of the counterfeit FRN's that McDowell and Hayden had been passing in the area bore serial MG 48084047B. Based on my training and experience, I recognize the FRN recovered from Hayden as what the USSS refers to as a "parent note," that is, a genuine note that is used as a template to produce counterfeit. Using a color printer, counterfeit producers make a copy of the front of the parent note (the "front plate"), and then cut that from the sheet of copier paper. Next, they make a copy of the back of the parent note (the "back plate"). The cut out front-plate copy is then taped, face down, over the back-plate copy, so that it will be perfectly aligned with the parent note (that is still on the printer) when that piece of paper is run through the printer a second time. The final step involves printing another copy of the back-plate of the parent note using the sheet of paper that has the front-plate image taped to it. This results in the back plate of the parent note being printed, with perfect alignment, on the back of the face-down copy of the front plate.

9. After Grotefend arrested McDowell, deputies conducted a brief on-scene inventory search of the Ford Fusion. A loaded Taurus handgun bearing serial TYH22082 was located in the center console. The vehicle was then transported to the Traverse City Law Enforcement Center, and a State of Michigan search warrant was obtained for it.

10. The search of the vehicle discovered merchandise that matched the items that had been purchased in Traverse City using counterfeit FRN's, as well as corresponding sales receipts. Additionally, a printer and printer paper were located in the truck of the vehicle. Scissors, scotch tape, paper clippings, and ink cartridges were also found in the vehicle. As described in paragraph 8, these are known tools and materials for producing counterfeit.

11. I participated in a custodial interview of McDowell. McDowell admitted to passing counterfeit at Zumiez, a fast-food restaurant later identified as Mrs. Fields, Walgreens and Target. McDowell also consented to a search of his iPhone and disclosed its passcode. Preliminary examination of the phone by a GTCSO detective discovered images of McDowell holding large quantities of what appeared to be U.S. currency, and communications with a presently unidentified person on 4 January 2020 discussing the printing of counterfeit currency.

12. I also participated in a custodial interview of Hayden. Over the course of the interview he stated that he "kind of" knew that "some" of the \$50 bills he had used were "kind of" fake, he asserted that they looked real, and he then claimed that he thought they were real. When he was confronted with the items taken from the search of the vehicle and was told they were used to make counterfeit currency, Hayden looked at the tabulation of items and mumbled, "That's what it is." Hayden also stated he had obtained the Ford Fusion from Ezell, and denied knowing anything about the handgun that was recovered from the front-center console.

13. Hayden's criminal history includes Michigan felony convictions in 2015 for burglary and home invasion, and a 2016 conviction for fraud.

14. I spoke with E-Clifton Ezell by phone on 9 Jan. 2020. Ezell stated that he had rented a vehicle over the Holidays in order to visit with friends and family, and that he had socialized with Hayden on or about 2 January and had become too drunk to drive. According to Ezell, Hayden had offered to drive him to where he was staying if he would let Hayden borrow the rental to go visit his grandmother the following day, and Ezell had agreed. Ezell said that he had been texting and calling Hayden repeatedly since then about the car because he needed to return it. Ezell denied knowing anything about a handgun having been in the vehicle.

15. A search of the USSS database for tracking counterfeit currency disclosed that the two counterfeit FRN's associated with this investigation were passed 34 times between 04 Jan 2020 and 28 Jan 2020 in Michigan, Ohio and Indiana.